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Attorney for Defendants Michael Bash, Jeremy Bash,
Berkley Enterprises, Inc.,
Pepperdine Enterprises, Inc., Ninety-Five Fort Apache
Complex, LLC and Royal View, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

**RAMA SOU; TAI BUI; and SCOTT
ZIMMERMAN,**

Plaintiffs,

v.

**MICHAEL BASH; JEREMY BASH;
BERKLEY ENTERPRISES, INC.;
PEPPERDINE ENTERPRISES, INC.;
NINETY-FIVE FORT APACHE
COMPLEX, LLC; ROYAL VIEW,
LLC; and DOES 1 through 20
inclusive,**

Defendants.

Case No. 2:15-cv-00698-APG-VCF

**NOTICE OF SETTLEMENT IN
PRINCIPLE AND REQUEST TO
VACATE ALL HEARINGS**

ORDER

1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR COUNSEL OF
2 RECORD:

3 Plaintiffs Rama Sou, Tai Bui, and Scott Zimmerman (collectively, "Plaintiffs"), on
4 the one hand, and defendants Michael Bash, Jeremy Bash, Berkley Enterprises, Inc.,
5 Pepperdine Enterprises, Inc., Ninety-Five Fort Apache Complex, LLC, and Royal View,
6 LLC (collectively, "Defendants"), on the other hand, have agreed in principle to settle the
7 above-captioned matter. Counsel for the parties have prepared and finalized the
8 Settlement Agreement, Stipulated Judgment, and Stipulated Dismissal, and the executed
9 agreements and payment are currently in transit as of March 7, 2019, mailed by certified
10 mail by Defendants' counsel to Plaintiffs' counsel. The parties intend to file the Stipulated
11 Dismissal as soon as practicable, but respectfully request that the parties are given 30 days
12 to file said dismissal. Accordingly, the parties respectfully request that the Court vacate
13 the trial readiness conference, currently scheduled for March 20, 2019 at 8:45am, the
14 settlement conference, currently scheduled for March 19, 2019 at 10:00am, and trial,
15 currently scheduled to begin March 25, 2019.

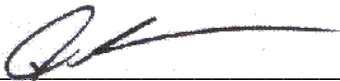
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17 Dated: March 12, 2019

LAW OFFICES OF MICHAEL K. SUH &
ASSOCIATES

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19 **IT IS SO ORDERED.**

By: /s/ Edward W. Suh

Edward W. Suh
CA Bar No. 265356
Admitted Pro Hac Vice

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22 UNITED STATES DISTRICT JUDGE
Dated: March 13, 2019.

Miles N. Clark
NV Bar No. 13848
KNEPPER & CLARK LLC

23
24 Attorneys for Plaintiffs
25 Rama Sou, Tai Bui, and Scott Zimmerman
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2 Dated: March 12, 2019

LAW OFFICE OF ANDREW H. PASTWICK
L.L.C.

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5 By: /s/ Andrew H. Pastwick

6 Andrew H. Pastwick
7 NV Bar No. 009146
8 LAW OFFICE OF ANDREW H.
9 PASTWICK L.L.C.

10 Attorneys for Defendants
11 Michael Bash, Jeremy Bash, Berkley
12 Enterprises, Inc., Pepperdine Enterprises, Inc.,
13 Ninety-Five Fort Apache Complex, LLC, and
14 Royal View, LLC

15 IT IS SO ORDERED:

16
17 UNITED STATES DISTRICT JUDGE

18 DATED: _____
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